

October 12, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Room TW-B204
Washington, D.C. 20554

Re: WT Docket No. 08-7, Petition of Twilio Inc. for an Expedited Declaratory Ruling
Stating That Messaging Services Are Title II Services

Dear Ms. Dortch:

CallSource provides call tracking and other technology-based services to different industries across the United States and Canada. We are also a Responsible Organization (RespOrg) who manages over 1.5 million toll-free numbers.

Our interest in these proceedings is of high importance to us and to our customers. Toll-free numbers and the ability to text enable them is an important service to offer subscribers.

One of the deciding factors for our customer's to do business with CallSource is the fact that we are a RespOrg. Knowing that we can administrate their toll-free numbers and perform disaster recovery on the fly is important to their businesses. If toll-free numbers can be text-enabled without going through a RespOrg or without the authorization of the subscribers, then this would cause doubt with our customers that we as a RespOrg can't properly manage their toll-free numbers.

Losing business opportunities because customers are not signing up for texting due to concerns that their numbers could be hijacked, or customers are moving away from Toll-Free for the same reason is unacceptable. In addition, losing a customer because of service issues caused by Zipwhip, or being blocked by Zipwhip or wireless carriers cannot be tolerated.

It is critically important for RespOrg's to be notified when a toll-free number has been requested to be text-enabled. Without a RespOrgs involvement this could lead to defrauded customers and harm business reputations which in turn destroys the integrity of the Toll-Free industry.

Sincerely,



Alex Macis
Carrier Relations Manager
CallSource